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7 UNITED STATES DISTRICT COURT FOR THE  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.  
13

14 MOHAMED SOUMAH,

15 Defendant.

CASE NO. MJ18-408

COMPLAINT for VIOLATION

Title 18, U.S.C., Section 1361

18 BEFORE the Honorable United States Magistrate Judge John L. Weinberg, United  
19 States Courthouse, Seattle, Washington.

20 The undersigned complainant being duly sworn states:

21 **COUNT 1**

22 **(Willful Injury to Government Property)**

23 On or about September 4, 2018, in King County, within the Western District of  
24 Washington, MOHAMED SOUMAH did willfully injure property of the United States,  
25 specifically a window within the United States Courthouse for the Western District of  
26 Washington, with damage to such property exceeding \$1000.00.

27  
28 Complaint: SOUMAH  
MJ18-408/USAO 2018R01075

UNITED STATES ATTORNEY  
700 STEWART STREET,  
SUITE 5220  
SEATTLE, WASHINGTON 98101  
(206) 553-7970

1  
2 All in violation of Title 18, United States Code, Section 1361.  
3

4 **Introduction**  
5

6 I, John Dean, being first duly sworn on oath, depose and say:  
7

8 1. I am a Senior Special Agent with the United States Department of  
9 Homeland Security, National Protection and Programs Directorate, assigned to the  
10 Federal Protective Service (FPS), Artic Northwest Region in Seattle, Washington. I have  
11 been a Special Agent with FPS for 18 years. In this capacity, I investigate and enforce a  
12 wide-range of federal criminal laws, including property destruction, thefts, assaults,  
13 threats, narcotics, weapons violations, and burglary, and violations involving the  
14 protection of federal government facilities and personnel. I further perform other  
15 activities under the authorization of the Homeland Security Act of 2002. Prior to my  
16 becoming a Special Agent, I had been a Police Officer with FPS for four (4) years, and  
17 prior to FPS employment, I was a Police Sergeant with the Department of Defense Police  
for three (3) years, and a Security Policeman with the United States Air Force for six (6)  
years. I have attended and graduated from the formal training academies for each of  
these federal agencies.

18 2. I make this affidavit from personal knowledge based on my participation in  
19 this investigation, including communications with others who have personal knowledge  
20 of the events and circumstances described herein, and information gained through my  
21 review of law enforcement reports and witness statements, and based on my training and  
22 experience. The information outlined below is provided for the limited purpose of  
23 establishing probable cause to believe that MOHAMED SOUMAH committed the  
24 violation of Title 18, United States Code, Section 1361, and does not contain all details or  
25 all facts of which I am aware relating to this investigation.

26 3. On September 4, 2018, at approximately 10:01 a.m., a window of the  
27 United States Courthouse for the Western District of Washington ("U.S. Courthouse")  
28

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1 was shattered and destroyed by a rock that had been thrown at it. Based on courthouse  
2 employee witness statements, a male later identified as MOHAMED SOUMAH had  
3 entered onto the courtyard steps of the U.S. Courthouse property and threw a rock at the  
4 window. The damage to the glass of the window consisted of a double pane section  
5 approximately four feet by four feet being shattered.

6       4. The U.S. Courthouse is located at 700 Stewart Street in Seattle,  
7 Washington, and is the property of the United States. FPS is authorized to protect this  
8 property which is a federally leased facility, under Title 40, United States Code, Section  
9 1315.

10        5. I have been advised by the General Services Administration that the  
11 aggregate replacement expense for the window is approximately between \$4500 to  
12 \$6,500.00.

## **CONCLUSION**

14       6.     Based on the foregoing, I submit that there is probable cause to believe that  
15 MOHAMED SOUMAH committed the crime of Willful Injury to Government Property,  
16 in violation of Title 18, United States Code, Section 1361, on September 4, 2018.

~~John Dean, Complainant  
Special Agent, FPS~~

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the defendant committed the offenses set forth in the Complaint. /

DATED this 4 day of September, 2018.

JOHN L. WEINBERG  
United States Magistrate Judge

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